

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**MOTION FOR TELECONFERENCE  
TO RESOLVE DISCOVERY DISPUTE**

Plaintiff Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis (“Estate of Mr. Pavlis”), respectfully moves the Court to schedule a teleconference to address outstanding discovery disputes relating to defendants’ failure to produce all responsive documents despite not objecting to any of Mr. Pavlis’ discovery requests.

The following attorneys, including Delaware counsel, participated in a verbal meet-and-confer via telephone on February 27, 2020:

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*Attorneys for Plaintiff, Deborah S. Skeans, Executrix of the Estate of Frank E. Pavlis.*

Counsel for the Estate of Mr. Pavlis are available for a teleconference on the following dates:

Monday, March 9, 2020

Tuesday, March 10, 2020

Wednesday, March 11, 2020

Based on the foregoing, the Estate of Mr. Pavlis respectfully moves this Court to schedule a teleconference to address outstanding discovery disputes.

STRADLEY RONON  
STEVENS & YOUNG, LLP

/s/Joelle E. Polesky

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Dated: February 28, 2020